

Equal Employment Opportunity Program

WDJT -- TV

WMLW -- LP

WYTU -- LP

August, 2004

I. General Policy

It is our policy to provide equal employment opportunity to all qualified individuals without regard to their race, color, religion, national origin, age, sex or other protected categories in all personnel actions including recruitment, evaluation, selection, promotion, compensation, training and termination.

It is our policy to promote equal employment opportunity through a positive, continuing program of specific practices designed to ensure the full realization of equal employment opportunity without regard to race, color, religion, national origin, age, sex or other protected categories.

It is our policy to communicate our equal employment policy and employment needs to sources of qualified applicants, without regard to race, color, religion, national origin, age, sex or other protected categories and to solicit their recruitment assistance on a continuing basis.

It is our policy to continually review our job structure and employment practices and maintain positive measures needed to ensure genuine equality of opportunity at all levels.

It is our policy to conduct a continuing program to exclude all unlawful forms of prejudice or discrimination based upon race, color, religion, national origin, age, sex or other protected categories from our personnel policies and practices and working conditions.

To make this policy effective, and to ensure conformance with the Rules and Regulations of the Federal Communications Commission, we have developed an Equal Opportunity Program, which includes the following elements:

II. Responsibility for Implementation

Barbara Stuarck, Corporate Director of Human Resources, is responsible for the administration and implementation of our Equal Employment Opportunity Program. It is also the responsibility of all persons making employment decisions with respect to recruitment, evaluation, selection, promotion, compensation, training and termination of employees to ensure that our policy and program are adhered to and that no person is discriminated against in employment because of race, color, religion, national origin, age, sex or other protected categories. It is our policy to ensure a positive application and vigorous enforcement of our policies and to review and control managerial and supervisory performance in the administration of our equal employment opportunity policies.

III. Policy Dissemination

It is our policy to disseminate our equal employment opportunity policies to job applicants, employees, and those with whom we regularly do business. To assure compliance with this requirement, we:

employment opportunity program with the goal of improving our program to the extent necessary. To assure compliance with this requirement, we periodically analyze measures taken to:

1. Disseminate the station's equal employment opportunity program to job applicants and employees;
2. Review seniority practices to ensure that such practices are nondiscriminatory;
3. Examine rates of pay and fringe benefits for employees having the same duties, and eliminate any inequities based upon race, color, religion, national origin, age, sex or other protected categories discrimination;
4. Utilize media for recruitment purposes in a manner that will contain no indication, either explicit or implicit, of the preferences for one race, color, religion, national origin, age, sex or other protected categories discrimination.
5. Ensure that promotions to positions of greater responsibility are made in a nondiscriminatory manner;
6. Where union agreement exist, cooperate with the union or unions in the development of programs to assure all persons equal opportunity for employment, irrespective of race, color, religion, national origin, age, sex or other protected categories, and include an effective nondiscrimination clause in new or renegotiated union agreements; and
7. Avoid the use of selection techniques or tests that have the effect of discriminating against any person based on race, color, religion, national origin, age, sex or other protected categories.